

# Evaluation of Energy Labelling Directive and certain aspects of the Ecodesign Directive

<b>General Questions</b>	
Location selection - Please select the country of your response -single choice reply-( <b>compulsory</b> )	Belgium
What is your affiliation? -single choice reply-( <b>compulsory</b> )	Other, namely
If other, please specify -open reply-( <b>optional</b> )	Federal Chamber of German Architects (Bundesarchitektenkammer e.V. - BAK), Transparency register: 08215638217-13
Which geographic level do you represent? -single choice reply-( <b>optional</b> )	EU Member state
Please select type of interest group (only if you selected 'I work for an interest group' above) -multiple choices reply-( <b>optional</b> )	Consumer interest group
This survey personalises the questions you answer based on the affiliation you selected above. The purpose of this is to ask only the most appropriate questions and to restrict the time required to respond. If you are happy to answer all questions, noting that this will take longer, please check the following box: -single choice reply-( <b>optional</b> )	Yes, I would like to take the full survey
<b>General Questionnaire</b>	
<b>Energy Labelling &amp; Ecodesign</b>	
Ecodesign Directive -single choice reply-( <b>optional</b> )	
Energy Labelling Directive -single choice reply-( <b>optional</b> )	
Please explain your answer (note that you will have the chance to discuss the ambition shown by the Directives later in the questionnaire) -open reply-( <b>optional</b> )	
Ecodesign Directive -single choice reply-( <b>optional</b> )	
Energy Labelling Directive -single choice reply-( <b>optional</b> )	
Please explain your answer -open reply-( <b>optional</b> )	
Ecodesign Directive -single choice reply-( <b>optional</b> )	

Energy Labelling Directive -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
Energy Labelling Directive	
Boilers and combi-boilers -single choice reply-(optional)	
Water heaters and hot water storage appliances -single choice reply-(optional)	
Televisions -single choice reply-(optional)	
Room air conditioning appliances -single choice reply-(optional)	
Domestic refrigerators and freezers -single choice reply-(optional)	
Domestic washing machines -single choice reply-(optional)	
Domestic dishwashers -single choice reply-(optional)	
Domestic laundry dryers -single choice reply-(optional)	
Vacuum cleaners -single choice reply-(optional)	
Electrical lamps (part of 'electrical lamps and luminaires') -single choice reply-(optional)	
Luminaires (part of 'electrical lamps and luminaires') -single choice reply-(optional)	
Domestic ovens -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
PCs and servers -single choice reply-(optional)	
Imaging equipment -single choice reply-(optional)	
External power supplies -single choice reply-(optional)	
Electric motors -single choice reply-(optional)	
Ventilation fans -single choice reply-(optional)	
Circulators in buildings -single choice reply-(optional)	
Electric pumps -single choice reply-(optional)	
Complex set-top boxes -single choice reply-(optional)	

Simple set-top boxes -single choice reply-(optional)	
Motors and variable speed drives -single choice reply-(optional)	
Lighting installations -single choice reply-(optional)	
Other (please specify) -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
Overall, across all product groups -single choice reply-(optional)	
Boilers and combi-boilers -single choice reply-(optional)	
Water heaters and hot water storage appliances -single choice reply-(optional)	
Televisions -single choice reply-(optional)	
Room air conditioning appliances -single choice reply-(optional)	
Domestic refrigerators and freezers -single choice reply-(optional)	
Domestic washing machines -single choice reply-(optional)	
Domestic dishwashers -single choice reply-(optional)	
Domestic Laundry dryers -single choice reply-(optional)	
Vacuum cleaners -single choice reply-(optional)	
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Overall, across all product groups -single choice reply-(optional)	
Boilers and combi-boilers -single choice reply-(optional)	

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Room air conditioning appliances -single choice reply-(optional)	
Domestic refrigerators and freezers -single choice reply-(optional)	
Domestic washing machines -single choice reply- (optional)	
Domestic dishwashers -single choice reply-(optional)	
Domestic laundry dryers -single choice reply-(optional)	
Vacuum cleaners -single choice reply-(optional)	
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Overall, across all product groups -single choice reply-(optional)	
Boilers and combi-boilers -single choice reply- (optional)	
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Domestic dishwashers -single choice reply-(optional)	
Domestic laundry dryers -single choice reply-(optional)	
Vacuum cleaners -single choice reply-(optional)	
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Luminaires (part of 'electrical lamps and luminaires') -single choice reply-(optional)	
Domestic ovens -single choice reply-(optional)	

Please explain your answer -open reply-(optional)

Noise (for Washing Machines and Dishwashers)

-single choice reply-(optional)

Water use (for Washing Machines and Dishwashers) -single choice reply-(optional)

Capacity/Size -single choice reply-(optional)

Product specific output efficiency (for example spin drying efficiency class) -single choice reply-(optional)

Please explain your answer, identifying particular product groups of concern -open reply-(optional)

Energy labelling currently focuses primarily on energy efficiency – as the rating and scale is based on an index of energy use per specific service/capacity unit, for example for televisions the power consumption per screen size expressed in W/dm<sup>2</sup>. Energy consumption is also currently displayed on labels as a numeric (X kWh/year) value. What should be the focus in future?

-single choice reply-(optional)

Please explain your answer -open reply-(optional)

How effective has energy labelling been in increasing the proportion of consumers that are informed about product energy use? -single choice reply-(optional)

Please explain your answer, identifying particular product groups of interest

-open reply-(optional)

How effective has energy labelling been in leading to consumers taking greater account of energy use – as compared to price, size, design, functionality - in their product purchase decisions?

-single choice reply-(optional)

Please explain your answer, identifying particular product groups of interest

-open reply-(optional)

Consumers understand the current (A-G) + 3 (A+++ , A++ , A+) class system

-single choice reply-(optional)

An A-G class scale is easier for consumers to

<p>understand than the A+++-D class scale</p> <p>-single choice reply-(optional)</p>	
<p>Current energy label classes provide a clear and useful differentiation of product energy efficiency</p> <p>-single choice reply-(optional)</p>	
<p>Classes are coherent with Ecodesign minimum requirements</p> <p>-single choice reply-(optional)</p>	
<p>The current classifications need to be changed</p> <p>-single choice reply-(optional)</p>	
<p>Consumers understand the seasonal and regional information provided in the energy label on air-conditioners</p> <p>-single choice reply-(optional)</p>	
<p>Please explain your answer</p> <p>-open reply-(optional)</p>	
<p>Adding further + classes, for example A++++</p> <p>-single choice reply-(optional)</p>	
<p>Re-setting all classes to an A-G scale</p> <p>-single choice reply-(optional)</p>	
<p>Re-setting all classes to an A-G scale with an overlap in the market between old 'A' and new 'A' label</p> <p>-single choice reply-(optional)</p>	
<p>Re-setting all classes to an A-G scale with a dated (year) reference on the label</p> <p>-single choice reply-(optional)</p>	
<p>Re-setting all classes to a 1-7 scale that takes over from A-G, in order to avoid overlap in the market between 'new' and 'old' A classes if the A-G scale was retained but rescaled</p> <p>-single choice reply-(optional)</p>	
<p>Introducing an A-'X' label with less than 7 classes</p> <p>-single choice reply-(optional)</p>	
<p>Introducing a dynamic class rating system, which automatically adjusts over time</p> <p>-single choice reply-(optional)</p>	
<p>Moving to an open ended scale</p> <p>-single choice reply-(optional)</p>	
<p>Removing or indicating on the label the energy classes that are empty of products</p>	

-single choice reply-(optional)	
The steps of the scale should be allowed to disregard life cycle cost savings to the consumer, meaning that a product with a better label class would be certain to save energy in the use phase, but could be so expensive to buy that it would not bring overall cost savings	
-single choice reply-(optional)	
Removing the entire energy labelling system	
-single choice reply-(optional)	
Other, please specify	
-single choice reply-(optional)	
Please explain your answer	
-open reply-(optional)	
Overall, across all product groups	
-single choice reply-(optional)	
Boilers and combi-boilers	
-single choice reply-(optional)	
Water heaters and hot water storage appliances	
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Televisions	
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Room air conditioning appliances	
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Domestic refrigerators and freezers	
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Domestic dishwashers	
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Domestic laundry dryers	
-single choice reply-(optional)	
Vacuum cleaners	
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Luminaires (part of 'electrical lamps and luminaires')	
-single choice reply-(optional)	
Domestic ovens	
-single choice reply-(optional)	

Please explain your answer

-open reply-(optional)

Overall, across all product groups

-single choice reply-(optional)

Boilers and combi-boilers

-single choice reply-(optional)

Water heaters and hot water storage  
appliances

-single choice reply-(optional)

Televisions

-single choice reply-(optional)

Room air conditioning appliances

-single choice reply-(optional)

Domestic refrigerators and freezers

-single choice reply-(optional)

Domestic washing machines

-single choice reply-(optional)

Domestic dishwashers

-single choice reply-(optional)

Domestic laundry dryers

-single choice reply-(optional)

Vacuum cleaners

-single choice reply-(optional)

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luminaires')

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Domestic ovens

-single choice reply-(optional)

Please explain your answer

-open reply-(optional)

Overall, across all product groups

-single choice reply-(optional)

Boilers and combi-boilers

-single choice reply-(optional)

Water heaters and hot water storage  
appliances

-single choice reply-(optional)



<p>Televisions</p> <p>-single choice reply-(optional)</p>	
<p>Room air conditioning appliances</p> <p>-single choice reply-(optional)</p>	
<p>Domestic refrigerators and freezers</p> <p>-single choice reply-(optional)</p>	
<p>Domestic washing machines</p> <p>-single choice reply-(optional)</p>	
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<p>Domestic laundry dryers</p> <p>-single choice reply-(optional)</p>	
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<p>Room air conditioning appliances</p> <p>-single choice reply-(optional)</p>	
<p>Domestic refrigerators and freezers</p> <p>-single choice reply-(optional)</p>	
<p>Domestic washing machines</p> <p>-single choice reply-(optional)</p>	
<p>Domestic dishwashers</p> <p>-single choice reply-(optional)</p>	

Domestic laundry dryers -single choice reply-(optional)	
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Luminaires (part of 'electrical lamps and luminaires') -single choice reply-(optional)	
Domestic ovens -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
For you, or your organisation, do you think that the benefits of mandatory energy labels outweigh their costs? -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	

For EU society as a whole, do you think that the benefits of mandatory energy labels outweigh their costs?

-single choice reply-(optional)

Please explain your answer

-open reply-(optional)

Should there be a legal provision, like for ecodesign, for voluntary initiatives on energy labelling, considering the administrative burden for the Commission and member state market surveillance costs?

-single choice reply-(optional)

Please explain your answer

-open reply-(optional)

The product groupings for the label should be broader and not so technology specific, for example a label on refrigerators should cover all types of refrigerators without variation in label class ambition levels by individual technology type (refrigerator with fresh-food storing compartment, refrigerator-chiller, refrigerator with 1/2/3-star compartments, refrigerator-freezer etc.)

-single choice reply-(optional)

The information on the label is accurate and reliable

-single choice reply-(optional)

The information reflects real-life use of the product

-single choice reply-(optional)

Energy labels are usually displayed in appropriate places in retail stores and showrooms

-single choice reply-(optional)

Energy labelling for distance selling (e.g. selling via internet) should be improved

-single choice reply-(optional)

It would make sense to allow for the use of QR-codes (see figure) in the label in order to

display information about the product on the consumers' smartphones or on smart meters.  -single choice reply-(optional)	
Energy labelling has led to lower production costs for manufacturers -single choice reply-(optional)	
Energy labelling has led to improved profit margins on regulated products -single choice reply-(optional)	
Energy labelling has unduly restricted the range of products on the market -single choice reply-(optional)	
Consumers prefer products with better label classes because they are interested in life cycle cost savings. It matters much less to them that a good label class also means a product which is better for the environment -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
Other environmental aspects (e.g. CO2 emissions) -single choice reply-(optional)	
Whole product life cycle energy consumption -single choice reply-(optional)	
Whole product life cycle resource efficiency -single choice reply-(optional)	
Annual running costs (the costs of operating the product) -single choice reply-(optional)	
Expected product life -single choice reply-(optional)	
Other, please add: -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
Two separate labels should exist, one for energy consumption and the second one for other environmental aspects	



-open reply-(optional)	
Energy use by appliances is determined partly by consumer behaviour. For example, frequent opening of a fridge will lead to an increased energy use, regardless of the energy label. A smart appliance could provide feedback to the user, after observing the user's behaviour with the appliance in the user's home, as to how his behaviour affects the energy performance of the appliance. Would you welcome the introduction of such an advanced and IT-supported form of energy labelling?	
-single choice reply-(optional)	
Please explain your answer and provide further innovative ideas	
-open reply-(optional)	
Have the energy labels been enforceable? If not sufficiently or not at all, what could be done to improve enforcement of energy labels?	
-single choice reply-(optional)	
Please explain your answer	
-open reply-(optional)	
An EU-Wide market surveillance authority covering the internal market	
-single choice reply-(optional)	
An EU-wide mandatory product database	
-single choice reply-(optional)	
An EU-wide transparent complaint procedure	
-single choice reply-(optional)	
MS-based transparent complaint procedure	
-single choice reply-(optional)	
Other, please describe:	
-single choice reply-(optional)	
Please explain your answer	
-open reply-(optional)	
Overall, across all product groups	
-single choice reply-(optional)	
Televisions	
-single choice reply-(optional)	
Room air conditioning appliances	
-single choice reply-(optional)	
Domestic refrigerators and freezers	

-single choice reply-(optional)	
Domestic washing machines -single choice reply-(optional)	
Domestic dishwashers -single choice reply-(optional)	
Domestic laundry dryers -single choice reply-(optional)	
Electrical lamps (part of 'electrical lamps and luminaires') -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
<b>Ecodesign Directive</b>	
Boilers and combi-boilers -single choice reply-(optional)	
Water heaters and hot water storage appliances -single choice reply-(optional)	
PCs and servers -single choice reply-(optional)	
Televisions -single choice reply-(optional)	
Stand-by and off-mode losses of EuPs -single choice reply-(optional)	
External power supplies -single choice reply-(optional)	
Tertiary lighting -single choice reply-(optional)	
Room air conditioning appliances -single choice reply-(optional)	
Electric motors -single choice reply-(optional)	
Ventilation fans -single choice reply-(optional)	
Circulators in buildings -single choice reply-(optional)	
Domestic refrigerators and freezers -single choice reply-(optional)	
Domestic washing machines -single choice reply-(optional)	
Domestic dishwashers -single choice reply-(optional)	



Laundry dryers -single choice reply-(optional)	
Vacuum cleaners -single choice reply-(optional)	
Simple set-top boxes -single choice reply-(optional)	
Non-directional lighting -single choice reply-(optional)	
Directional lighting -single choice reply-(optional)	
Water pumps -single choice reply-(optional)	
Complex set-top boxes (voluntary agreement) -single choice reply-(optional)	
Imaging equipment (voluntary agreement) -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
Overall, across all product groups -single choice reply-(optional)	
Boilers and combi-boilers -single choice reply-(optional)	
Water heaters and hot water storage appliances -single choice reply-(optional)	
PCs and servers -single choice reply-(optional)	
Televisions -single choice reply-(optional)	
Standby and off-mode losses of EuPs -single choice reply-(optional)	
External power supplies -single choice reply-(optional)	
Tertiary lighting -single choice reply-(optional)	
Room air conditioning appliances -single choice reply-(optional)	
Electric motors -single choice reply-(optional)	
Ventilation fans -single choice reply-(optional)	
Circulators in buildings	

-single choice reply-(optional)	
Domestic refrigerators and freezers -single choice reply-(optional)	
Domestic washing machines -single choice reply-(optional)	
Domestic dishwashers -single choice reply-(optional)	
Laundry dryers -single choice reply-(optional)	
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Water pumps -single choice reply-(optional)	
Complex set-top boxes (voluntary agreement) -single choice reply-(optional)	
Imaging equipment (voluntary agreement) -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
Requirements on energy use in Ecodesign implementing measures and voluntary agreements are based primarily on energy efficiency - the energy use per specific service/capacity unit, for example for televisions the power consumption per screen size expressed in $W/dm^2$ , rather than on the absolute energy consumption. What should be the basis of such requirements in implementing measures and voluntary agreements in the future?  -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
The Ecodesign implementing measures adopted so	

far focus primarily on the impacts in the use phase of a product, which is in most energy-using products responsible for the largest share of the overall impact. Does the Ecodesign Directive or its implementation need to be changed to more proportionately address impacts in other life-cycle phases (including production and disposal) other than the use phase? If yes, how should it be changed? If no, why not?

-single choice reply-(optional)

Please explain your answer

-open reply-(optional)

Overall, across all product groups

-single choice reply-(optional)

PCs and servers

-single choice reply-(optional)

Televisions

-single choice reply-(optional)

Standby and off-mode losses of EuPs

-single choice reply-(optional)

External power supplies

-single choice reply-(optional)

Tertiary lighting

-single choice reply-(optional)

Room air conditioning appliances

-single choice reply-(optional)

Electric motors

-single choice reply-(optional)

Ventilation fans

-single choice reply-(optional)

Circulators in buildings

-single choice reply-(optional)

Domestic refrigerators and freezers

-single choice reply-(optional)

Domestic washing machines

-single choice reply-(optional)

Domestic dishwashers

-single choice reply-(optional)

Laundry dryers

-single choice reply-(optional)

Simple set-top boxes

-single choice reply-(optional)

<b>Non-directional lighting</b> -single choice reply-(optional)	
<b>Directional lighting</b> -single choice reply-(optional)	
<b>Imaging equipment</b> -single choice reply-(optional)	
<b>Complex set-top boxes</b> -single choice reply-(optional)	
<b>Please explain your answer</b> -open reply-(optional)	
<b>Overall, across all product groups</b> -single choice reply-(optional)	
<b>PCs and servers</b> -single choice reply-(optional)	
<b>Televisions</b> -single choice reply-(optional)	
<b>Standby and off-mode losses of EuPs</b> -single choice reply-(optional)	
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<b>Domestic dishwashers</b> -single choice reply-(optional)	
<b>Laundry dryers</b> -single choice reply-(optional)	
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<b>Please explain your answer</b> -open reply-(optional)	
<b>Overall, across all product groups</b> -single choice reply-(optional)	
<b>Boilers and combi-boilers</b> -single choice reply-(optional)	
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Non-directional lighting -single choice reply-(optional)	
Directional lighting -single choice reply-(optional)	
Imaging equipment -single choice reply-(optional)	
Complex set-top boxes -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
For you, or your organisation, do you think that the benefits of the Ecodesign regulations and voluntary agreements outweigh their costs? -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
For EU society as a whole, do you think that the benefits of Ecodesign regulations and voluntary agreements outweigh their costs? -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
Should the possibility of laying down Ecodesign requirements in voluntary agreements – rather than mandatory requirements – be maintained? -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
Go beyond the Least Life Cycle Cost Approach (LLCC) when setting minimum requirements, i.e. to aim for a staged approach towards the highest feasible energy efficiency level while at the same time ensuring that the life cycle costs of products are not getting higher for the consumer compared to the base case (considering also what room this would	



<p>leave to energy labelling). The revised Methodology for Ecodesign of Energy-related Products (MEErP) already refers to this efficiency point as “Break Even Point“.</p> <p>-single choice reply-(optional)</p>	
<p>Involve a check on what would it mean to go beyond LLCC by identifying the “Break Even Point” in the preparatory studies.</p> <p>-single choice reply-(optional)</p>	
<p>Strive for more ambitious requirements not by going beyond LLCC cost but rather to make life cycle cost calculations more realistic by applying “learning curves” (consideration of decreasing production costs over time) -single choice reply-(optional)</p>	
<p>Keep the present practice of life cycle calculation</p> <p>-single choice reply-(optional)</p>	
<p>Give benchmarks a more powerful role as targets. They should serve as starting point for setting new MEPS at the time of revision, while still respecting the rules of Article 15 of the Ecodesign Directive</p> <p>-single choice reply-(optional)</p>	
<p>Identify reference levels for best not yet available technology in preparatory studies and use it to predefine future energy efficiency classes in Energy Label. -single choice reply-(optional)</p>	
<p>Please explain your answer</p> <p>-open reply-(optional)</p>	
<p>Which other changes would you suggest and why?</p> <p>-open reply-(optional)</p>	
<p>Overall, across all product groups</p> <p>-single choice reply-(optional)</p>	
<p>Televisions</p> <p>-single choice reply-(optional)</p>	
<p>Standby and off-mode losses of EuPs</p> <p>-single choice reply-(optional)</p>	
<p>External power supplies</p> <p>-single choice reply-(optional)</p>	
<p>Tertiary lighting</p> <p>-single choice reply-(optional)</p>	
<p>Room air conditioning appliances</p> <p>-single choice reply-(optional)</p>	

Electric motors -single choice reply-(optional)	
Ventilation fans -single choice reply-(optional)	
Circulators in buildings -single choice reply-(optional)	
Domestic refrigerators and freezers -single choice reply-(optional)	
Domestic washing machines -single choice reply-(optional)	
Domestic dishwashers -single choice reply-(optional)	
Laundry dryer -single choice reply-(optional)	
Simple set-top boxes -single choice reply-(optional)	
Directional lighting -single choice reply-(optional)	
Imaging equipment -single choice reply-(optional)	
Complex set-top boxes -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
Ecodesign has led to lower production costs for manufacturers -single choice reply-(optional)	
Ecodesign has led to improved profit margins on regulated products -single choice reply-(optional)	
The Ecodesign regulations unduly restricted the range of products on the market -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
<b>Rulemaking Procedures</b>	
Ecodesign working plan -single choice reply-(optional)	
Preparatory study -single choice reply-(optional)	

<p>Consultation forum</p> <p>-single choice reply-(optional)</p>	
<p>Impact assessment and draft regulation</p> <p>-single choice reply-(optional)</p>	
<p>Member State expert group on labelling</p> <p>-single choice reply-(optional)</p>	
<p>Regulatory Committee vote</p> <p>-single choice reply-(optional)</p>	
<p>WTO notification process</p> <p>-single choice reply-(optional)</p>	
<p>Scrutiny/Objection by European Parliament and Council</p> <p>-single choice reply-(optional)</p>	
<p>Please explain your answer</p> <p>-open reply-(optional)</p>	
<p>Ecodesign</p> <p>-single choice reply-(optional)</p>	
<p>Energy Labelling</p> <p>-single choice reply-(optional)</p>	
<p>Please explain your answer -open reply-(optional)</p>	
<p>Ecodesign</p> <p>-single choice reply-(optional)</p>	
<p>Energy Labelling</p> <p>-single choice reply-(optional)</p>	
<p>Please explain your answer -open reply-(optional)</p>	
<p>No change in the framework, no loss in the effectiveness of the implementation and taking into account the number of energy-related products already covered and to be covered?</p> <p>-single choice reply-(optional)</p>	
<p>The scope was extended to non-energy-related products and means of transport</p> <p>-single choice reply-(optional)</p>	
<p>Environmental impacts other than resource use were shown in the label, and ecodesign shifted focus to production phase impacts?</p> <p>-single choice reply-(optional)</p>	
<p>Please explain your answer -open reply-(optional)</p>	

How could the administrative burden of the Commission in developing implementing measures and delegated acts be decreased so as to allow a faster development and review of measures and acts?

-multiple choices reply-(optional)

Please explain your answer -open reply-(optional)

Does the market surveillance regulation (EC) no 765/2008 and the Commission proposal COM(2013) 75 amending it, provide national authorities with adequate competences and powers to carry out market surveillance activities and ensure reliability of the Energy Label?

-single choice reply-(optional)

Please explain your answer -open reply-(optional)

Does the market surveillance regulation (EC) no 765/2008 and the Commission proposal COM(2013) 75 amending it, provide national authorities with adequate competences and powers to carry out market surveillance activities on Ecodesign Directive?

-single choice reply-(optional)

Please explain your answer -open reply-(optional)

Have appropriate and effective mechanisms for cooperation in market surveillance between administrations been established for Energy Labelling and Ecodesign Directives?

-single choice reply-(optional)

Please explain your answer -open reply-(optional)

Do Member States provide sufficient resources for national market surveillance activities for Energy Labelling and Ecodesign?

-single choice reply-(optional)

Please explain your answer -open reply-(optional)

Should the Commission or other EU bodies be more involved to ensure enforcement activities for the Energy Labelling and Ecodesign Directives, considering for example the EU product notification system in place under the cosmetic products regulation (2009/1223/EC, Article 13) or in form of an EU-wide complaint system or other?

-single choice reply-(optional)

Who should be involved and what role could they play?

-open reply-(optional)

Should the Energy Labelling Directive be changed to include a conformity assessment procedure (like the Ecodesign Directive has)?

-single choice reply-(optional)

Please explain your answer -open reply-(optional)

Is the conformity assessment procedure in the Ecodesign Directive appropriate? -single choice reply-(optional)

Please explain your answer -open reply-(optional)

What else could be improved with regard to market surveillance?

-open reply-(optional)

Have effective harmonised energy performance testing standards been developed for the product groups regulated under the Energy Labelling and Ecodesign Directives?

-single choice reply-(optional)

Please explain your answer -open reply-(optional)

## Scope Expansion

Should the scope of the Energy Labelling Directive be expanded to non ErP (non Energy related Products – which are products that do not influence energy consumption during use, but have other environmental impacts due e.g. to their manufacturing, such as foodstuffs, clothing and furniture)?

-single choice reply-(optional)

No

Please explain your answer

-open reply-(optional)

NEr include construction products which are used in the process of erecting buildings. A single construction product – e.g. a solid brick – will never be used on its own by consumers. The energy consumption and efficiency of a building is not dependent on the energetic value of a single product but on the effect of a sustainable and integrated design process. A construction product with the highest rating in a labelling-scheme used in the wrong manner, could lead to an energy inefficient building, if not used the right way. Buildings do not only consist of a number of construction products but also on the interplay of customer needs, geographical and climatic conditions as well as their direct surroundings. Architects due to their education and training are able to conduct and coordinate the design- and building process in a way that the maximum in energy efficiency and sustainability is achieved in a finished building which in the end is tailored to the exact needs of the user and the environment. This is even true for partially prefabricated buildings that still need to be completed with manual labour. An eventual building therefore is always a prototype and cannot be compared with the products falling under the ELD so far (such as refrigerators or electric devices). Introducing energy labelling for construction products or buildings would not give the user or customer any added value or security. The involvement of an architect who by education and training has the

knowledge of product specifications and their interaction with each other and the environment is in our view the most important prerequisite in achieving the goals of energy efficiency and sustainability. With regard to the ELD it needs to be pointed out that energy efficiency of buildings, including a labelling-scheme is already covered by the Energy Efficiency Directive (2012/27/EU) and the Energy Performance of Buildings Directive (2010/31/EU).

Should the scope of the Ecodesign Directive be expanded to non ErP (non Energy related Products)?

No

-single choice reply-(optional)

Please explain your answer

-open reply-(optional)

Construction products are already regulated by the Construction Products Directive (2011/305/EU), which deals with their distribution within the European single market. Regulation of construction products or buildings by the EDD consequently, is unnecessary and leads to overregulation and confusion.

Should the scope of the Energy Labelling Directive and the Ecodesign Directive be limited to energy/resource use in the use phase, while a set of other legal instruments applying to other significant environmental aspects (e.g. material efficiency, pollution) is adopted?

-single choice reply-(optional)

Please explain your answer

-open reply-(optional)

Construction products presently are not covered by the ALD and EDD. Therefore this question cannot be answered at this point.

Should the Energy Labelling Directive's scope be extended to cover buildings, technical building systems and other systems, thus ensuring uniform EU rules for the labelling of such systems, instead of the current approach where Member States set the labelling rules in the national transposition of the Energy Performance of Buildings Directive and in other national legislation?

No

-single choice reply-(optional)

Please explain your answer

-open reply-(optional)

For the improvement of energy efficiency of buildings, the creation of an energy label for buildings is not seen as constructive. Buildings or parts of buildings raised within a construction process are complex entities that are not built in an industrialized and standardized manner. Buildings are prototypes and thus cannot be compared to products such as refrigerators or electric devices. To introduce a kind of labeling on the building as is used for consumer products would simply not be possible. With regard to the ELD it needs to be pointed out that the energy efficiency of buildings, including a labeling-scheme is already covered by the Energy Efficiency Directive (2012/27/EU) and the Environmental Performance of Buildings Directive (2010/31/EU). Additional regulation of construction products or buildings is unnecessary and leads to overregulation and confusion.

Do you see opportunities for synergies between all or part of the EU legislation relevant to product groups? For example: merging all required documents and information into a single form, or merging certain Directives into one (Ecodesign, Energy Star, Energy labelling, and Tyre labelling)

Yes

-single choice reply-(optional)

Please explain your answer, with reference to the specific changes and their feasibility

-open reply-(optional)

The Federal Chamber of German Architects highly welcomes the initiative of the Commission to reduce administrative burden and red tape. The merging of existing Directives and/or documents and information would be a right step in this direction. However, keeping in mind the above position it has to be ensured that any regulation regarding buildings will not merged with regulations that cover products because – as explained above – buildings are never products and therefore cannot be treated as such.

## Closing

If you would like to leave any further comments on Energy Labelling or Ecodesign, please use the following space -open reply-(optional)

Additional regulation will also increase the administrative burden on those working with the affected products. It would put more pressure on architects who mainly work in small and micro sized enterprises without offering benefits to the customer side as explained above. Therefore, the Federal Chamber of German Architects rejects the notion of expanding the ELD and EDD on construction products and buildings.

Are you happy to be contacted by the evaluation study team for an in-depth interview to follow-up on this survey and to discuss these questions and related issues in more detail? If so, please provide your telephone number and e-mail. -open reply-(optional)

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